

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

CHUGAI PHARMACEUTICAL CO., LTD.,)	Redacted - Public Version
)	
Plaintiff,)	
)	
v.)	C.A. No. 18-1802-MN
)	
ALEXION PHARMACEUTICALS, INC.,)	CONSOLIDATED
)	
Defendant.)	

**JOINT STIPULATION AND [PROPOSED] ORDER
TO STAY PENDING SETTLEMENT**

Karen E. Keller (No. 4489)
Nathan R. Hoeschen (No. 6232)
SHAW KELLER LLP
I.M. Pei Building
1105 North Market Street, 12th Floor
Wilmington, DE 19801
(302) 298-0700
kkeller@shawkeller.com
nhoeschen@shawkeller.com

Brian E. Farnan (No. 4089)
Michael J. Farnan (No. 5165)
FARNAN LLP
919 N. Market Street, 12th Floor
Wilmington, DE 19801
(302) 777-0300
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

Dated: February 14, 2022

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CHUGAI PHARMACEUTICAL CO., LTD.,)	Redacted - Public Version
)	
Plaintiff,)	
)	
v.)	
)	
ALEXION PHARMACEUTICALS, INC.,)	C.A. No. 18-CV-1802-MN
)	
Defendant.)	CONSOLIDATED
)	

**JOINT STIPULATION AND [PROPOSED] ORDER
TO STAY PENDING SETTLEMENT**

Plaintiff Chugai Pharmaceutical Co., Ltd. (“Chugai”) and Alexion Pharmaceuticals, Inc. (“Alexion”) hereby present the Court with a Joint Stipulation to Stay Pending Settlement;

WHEREAS, trial in this action was scheduled to begin on February 14, 2022;

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

WHEREAS, the parties now ask the Court to the stay the case and continue the trial;

WHEREAS, pursuant to D. Del. L.R. 16.4, counsel certifies that a copy of this stipulation has been sent to each client.

IT IS HEREBY STIPULATED AND ORDERED THAT: the case is STAYED for thirty

days [REDACTED] and the parties

thereafter file a stipulated dismissal. If the settlement agreement is not finalized within 30 days, the Parties shall provide the Court a report regarding their progress toward a final settlement.

Respectfully submitted,

/s/ Karen E. Keller

Karen E. Keller (No. 4489)
Nathan R. Hoeschen (No. 6232)
SHAW KELLER LLP
I.M. Pei Building
1105 North Market Street, 12th Floor
Wilmington, DE 19801
(302) 298-0700
kkeller@shawkeller.com
nhoeschen@shawkeller.com

Attorneys for Plaintiff
CHUGAI PHARMACEUTICAL CO., LTD.

/s/ Brian E. Farnan

Brian E. Farnan (No. 4089)
Michael J. Farnan (No. 5165)
FARNAN LLP
919 N. Market Street, 12th Floor
Wilmington, DE 19801
(302) 777-0300
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

Attorneys for Defendant
ALEXION PHARMACEUTICALS, INC.

Dated: February 14, 2022

IT IS SO ORDERED this ____ day of _____, 2022.

The Honorable Maryellen Noreika

CERTIFICATE OF SERVICE

I, Nathan R. Hoeschen, hereby certify that on February 14, 2022, this document was served on the persons listed below in the manner indicated:

BY EMAIL

Brian E. Farnan
Michael J. Farnan
FARNAN LLP
919 N. Market Street, 12th Floor
Wilmington, DE 19801
(302) 777-0300
bfarnan@farnanlaw.com
mfarnan@farnanlaw.com

Nicole A. Saharsky
MAYER BROWN LLP
1999 K Street, Northwest
Washington, DC 20006
(202) 263-3000
nsaharsky@mayerbrown.com

Brian W. Nolan
Ying-Zi Yang
Lisa M. Ferri
Manuel J. Velez
Richard J. McCormick
Lana S. Khoury
Ryan T. Babcock
MAYER BROWN LLP
1221 Avenue of the Americas
New York, NY 10020
(212) 506-2500
bnolan@mayerbrown.com
yyang@mayerbrown.com
lferri@mayerbrown.com
mvelez@mayerbrown.com
rmccormick@mayerbrown.com
lkhoury@mayerbrown.com
rbabcock@mayerbrown.com

/s/ Karen E. Keller

Karen E. Keller (No. 4489)
Nathan R. Hoeschen (No. 6232)
SHAW KELLER LLP
I.M. Pei Building
1105 North Market Street, 12th Floor
Wilmington, DE 19801
(302) 298-0700
kkeller@shawkeller.com
nhoeschen@shawkeller.com
Attorneys for Plaintiff